

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|--------------------------------|---|---------------------|
| SHAWN DRUMGOLD, |) | |
| PLAINTIFF |) | |
| |) | |
| VS. |) | C.A. NO. 04-11193NG |
| |) | |
| TIMOTHY CALLAHAN, FRANCIS M. |) | |
| ROACHE, PAUL MURPHY, RICHARD |) | |
| WALSH, AND THE CITY OF BOSTON, |) | |
| DEFENDANTS |) | |
| |) | |

DEFENDANTS' PROPOSED AMENDED JOINT DISCOVERY SCHEDULE

Now come the Defendants in the above-captioned action and, pursuant to the Court's electronic notes of 3/6/07 requesting that the parties submit a Proposed Amended Joint Discovery Schedule, propose the following dates consistent with the previous dates set by the Court's Electronic Scheduling Order of 12/6/06:

- A. Discovery to be completed by 5/31/07;
- B. Plaintiff expert disclosure to be completed on or before 5/31/07;
- C. Defendant's expert disclosure to be completed on or before 6/15/07;
- D. Expert depositions to be completed on or before 6/30/07;
- E. Defendant's motion for summary judgment to be filed on or before 8/10/07;
- F. Plaintiff's response due by 9/9/07.

The defendants state that they have submitted the above proposed set of dates to plaintiff counsel for the purposes of filing an Amended Joint Discovery Schedule, however, plaintiff counsel objects to the proposed schedule and advises that the parties should file their own respective discovery schedules.

The defendants believe that the timing of all proposed dates is consistent with the Court's extension of the discovery schedule to 5/31/07.

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